

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

In Re:

ANTONIO FRANCINE FLIGHT AND
KIM LYNNICE FLIGHT,

Debtors.

IN CHAPTER 13 PROCEEDING
NO. 14-16434

TRUSTEE'S OBJECTION TO CONFIRMATION

The Trustee objects to confirmation of the debtors' plan, filed August 28, 2014 (ECF No. 2) as follows:

(1) According to Springleaf Financial Services (ECF Claim No. 7), the debtor is \$499.52 delinquent on her second mortgage on the real property at 327 29th Avenue, Seattle, Washington. The debtors need to amend the plan to provide for payment of Springleaf through the plan (i.e., the Trustee will make the ongoing and pre-petition delinquency payment from debtors' plan payments). Local Bankr. R. 3015-1(j). (2) The debtors' Schedule A (ECF No. 1) fails to include the debtors' interest in the real property at 11604 Rainier Avenue South, Unit 201, Seattle, Washington. (3) The debtors' plan fails to provide for the real property at 11604 Rainier Avenue South, Unit 201, Seattle, Washington. Bank of America also pointed out this problem in its objection to confirmation (ECF No. 26). If the debtors intend to surrender the property, they should indicate that. (4) The debtors' plan is not feasible. To pay the mortgages on the real property at 327 29th Avenue, Seattle, Washington and the debtors' other obligations, the debtors would need to increase their monthly plan payment to approximately \$3,500.00. That amount is an estimate, however, as the senior mortgage creditor has not filed its claim for the real property at 327 29th Avenue, Seattle, Washington. (5) The Trustee reserves the right to assert additional bases for this pleading.

TRUSTEE'S OBJECTION TO CONFIRMATION - 0

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THE TRUSTEE REQUESTS:

That the Court enter an order denying confirmation of the debtors' plan, and setting deadlines for filing and noting a feasible amended plan.

Dated: October 28, 2014

/s/ K. Michael Fitzgerald
K. Michael Fitzgerald, WSBA #8115
Chapter 13 Trustee